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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

N.Z., R.M., B.L., S.M., and A.L.,
individually and on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

FENIX INTERNATIONAL
LIMITED, FENIX INTERNET LLC,
BOSS BADDIES LLC, MOXY
MANAGEMENT, UNRULY
AGENCY LLC (also d/b/a DYSRPT
AGENCY), BEHAVE AGENCY
LLC, A.S.H. AGENCY, CONTENT
X, INC., VERGE AGENCY, INC.,
AND ELITE CREATORS LLC,

Defendants.

CASE NO.: 8:24-cv-01655-FWS-SSC

Hon. Fred W. Slaughter

**(1) JOINT STIPULATION EXTENDING
TIME TO RESPOND TO COMPLAINT;**

**(2) [PROPOSED] ORDER (filed under
separate cover); and**

**(3) PROOF OF SERVICE (filed under
separate cover)**

1 Plaintiffs N.Z., R.M., B.L., S.M., and A.L. (collectively, “Plaintiffs”) and Specially
2 Appearing Defendants Fenix International Limited and Fenix Internet LLC (collectively,
3 the “Fenix Defendants,” and together with Plaintiffs, “the Parties”) hereby stipulate and
4 agree as follows:

5 WHEREAS, on July 29, 2024, Plaintiffs filed a complaint in the above-captioned
6 action (ECF No. 1) (“Complaint”) against the Fenix Defendants, among others;

7 WHEREAS, on August 5, 2024, Plaintiffs served a summons on Defendant Fenix
8 Internet LLC;

9 WHEREAS, Fenix Internet LLC’s deadline to plead, move, or otherwise respond to
10 the Complaint is August 26, 2024;

11 WHEREAS, on August 20, 2024, Fenix International Limited executed a waiver of
12 service of summons pursuant to Federal Rule of Civil Procedure 4(d);

13 WHEREAS, because Fenix International Limited waived service outside of the
14 United States, pursuant to Federal Rules of Civil Procedure 4(d)(3) and 12(a)(1)(A)(ii),
15 Fenix International Limited’s time to plead, move, or otherwise respond to the Complaint
16 is 90 days from August 20, 2024, or November 18, 2024;

17 WHEREAS, it will save time and resources for the Court and the Parties, and further
18 the interests of justice, to coordinate a uniform response date for the Fenix Defendants to
19 respond to the Complaint;

20 WHEREAS, the parties have met and conferred and agree that it is appropriate for
21 the Fenix Defendants to both respond to the Complaint 60 days after August 26, 2024, or
22 October 25, 2024;

23 WHEREAS, this stipulation is not a waiver of any of the Fenix Defendants’ rights,
24 remedies, claims, or defenses, including but not limited to any arguments related to
25 personal jurisdiction and the proper venue for the above-captioned action;

26 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and
27 between the Parties, through their undersigned counsel and subject to Court approval, as
28 follows:

1 1. Fenix Internet LLC and Fenix International Limited shall respond to the
2 Complaint on or before October 25, 2024;

3 2. Nothing in this stipulation shall be construed to waive, forfeit, limit, or
4 otherwise impair the Fenix Defendants' rights, remedies, claims, and defenses, including
5 but not limited to any arguments related to personal jurisdiction and the proper venue for
6 the above-captioned action.

7
8 DATED: August 21, 2024

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10 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

11 By: /s/ Jason D. Russell
12 JASON D. RUSSELL

13 *Attorneys for Specially Appearing Defendants*
14 *Fenix International Limited and Fenix Internet LLC*
15 *All other signatories listed, and on whose behalf the*
16 *filing is submitted, concur in the filing's content and*
17 *have authorized the filing.*

18 HAGENS BERMAN SOBOL SHAPIRO LLP

19
20 By: /s/ Robert B. Carey
21 ROBERT B. CAREY
22 *Attorneys for Plaintiffs*
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